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May 31, 2024

**VIA ECF**

Hon. H. Kenneth Schroeder, Jr.  
United States Magistrate Judge  
2 Niagara Square  
Buffalo, New York 14202

Re: *Bruce C. McNeil v. The City of Buffalo, et al.*  
Case No.: 20-CV-00998

Dear Judge Schroeder:

Plaintiff respectfully submits this letter under Local Rule 7(a)(2)(C) to request leave to file a reply brief in support of his motion to compel discovery that exceeds the default ten-page limit.

Plaintiff's motion seeks to compel Defendants to provide complete responses to numerous discovery requests. In response, Defendants have filed a 23-page opposition memorandum asserting lengthy objections to Plaintiff's requests. To fully respond to Defendants' arguments and explain why each of the identified discovery requests should be compelled, Plaintiff requires more than the ten pages allotted for reply briefs under the Local Rules.

Plaintiff's counsel has endeavored to be as concise as possible while still thoroughly addressing the remaining issues. Given the number of requests in dispute, however, and the required explanation of some of the factual and legal arguments, Plaintiff respectfully submits that a reply memorandum of up to 20 pages is required. This additional length will enable Plaintiff to clearly set forth his position about each of the remaining contested discovery requests.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Alysha M. Naik', is written over a light blue horizontal line.

Alysha M. Naik

**RUPP PFALZGRAF** LLC

May 31, 2024

Page 2

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